

# **EXHIBIT 2**

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**From:** Shaun Paisley <shaun@kzllp.com>  
**Sent:** Thursday, July 09, 2020 9:01 AM  
**To:** Harvey, Dean  
**Cc:** gan@rpnalaw.com; vlohe@mrlp.com; tstitt@mrlp.com; dhauge@mrlp.com; mattanasio@cooley.com; bmejia@cooley.com; 'Moore, Christie A.'; Croft, W. Scott; Washburn, Rachel A.; michael.murphy@dlapiper.com; ltk@dlapiper.com; sebastinellij@gtlaw.com; holdernessh@gtlaw.com; paul.riehle@dbb.com; Brendan Pegg; ndigiovanni@lockelord.com; RMcClendon@lockelord.com; skook@hinshawlaw.com; twall@hinshawlaw.com; Drew Koning; Blake Zollar; Anne K. Edwards; kwenger@sgrlaw.com; jmarino@sgrlaw.com; baillaw@usa.net; eswanholt@foley.com; Greg Day; Healy, Nicole S.; Gerard Pecht; sumera.khan@nortonrosefulbright.com  
**Subject:** RE: In Re California Bail Bond Antitrust Litigation, No. 3:19-cv-00717-JST: Protective Order

Dean,

As you know, there is still a stay on discovery in place, and it is therefore premature to discuss negotiation of a stipulated protective order.

If you wish to engage further on All-Pro's Rule 11 motion, you can email me directly.

**Shaun Paisley**

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**From:** Harvey, Dean <[dh Harvey@lchb.com](mailto:dh Harvey@lchb.com)>  
**Sent:** Thursday, July 2, 2020 12:24 PM  
**To:** Shaun Paisley <[shaun@kzllp.com](mailto:shaun@kzllp.com)>  
**Subject:** FW: In Re California Bail Bond Antitrust Litigation, No. 3:19-cv-00717-JST: Protective Order

Hi Shaun – for some reason I received an error message indicating you may not have received this. Re-sending.

Dean M. Harvey  
Lief, Cabraser, Heimann & Bernstein, LLP

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**From:** Harvey, Dean  
**Sent:** Thursday, July 02, 2020 12:16 PM

**To:** Anne K. Edwards; Beatriz Mejia; Blake Zollar; Brendan Pegg; Christie A. Moore; David F. Hauge; Drew Koning; Erik K. Swanholt; Gary A. Nye; Gerard Pecht; Gregory S. Day; Howard Holderness; John A. Sebastinelli; John M. Rorabaugh; John Marino; Jon Cieslak; Kristen Wenger; Lindsay Cooper; Lisa Tenorio-Kutzkey; Michael Attanasio; Michael P. Murphy; Nicole S. Healy; Paul J. Riehle; Rachel Washburn; Shaun Paisely; Spencer Kook; Sumera Khan; Todd H. Stitt; Travis Wall; Vincent S. Loh; W. Scott Croft

**Cc:** Benson, Katherine Lubin; Salahi, Yaman; Dafa, Jallé; Rivera, Omar

**Subject:** In Re California Bail Bond Antitrust Litigation, No. 3:19-cv-00717-JST: Protective Order

Good afternoon counsel,

Counsel for All-Pro has told us that the lack of a protective order is an impediment to it sharing information with us. Accordingly, we have drafted the attached protective order, that is nearly verbatim from the Northern District's model order. The redlines in the attached show the minor changes we made. Please let us know if you have any comments or edits, and provide us with the relevant signature block information for your client(s). We would like to file this as soon as possible.

Have a nice holiday weekend.

Best,

Dean

**Lieff  
Cabraser  
Heimann &  
Bernstein**  
Attorneys at Law

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